

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE,)	CASE NO. CV 05-0019
and XU JING JI,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
JUNG JIN CORPORATION, a CNMI corporation,)	
ASIA ENTERPRISES INC., a CNMI corporation,)	
PARK HWA SUN, KIM HANG KWON,)	
KSK CORPORATION, a CNMI corporation, and)	
KIM KI SUNG,)	
)	
Defendants.)	
)	

DEPOSITION OF KIM SUNG EUN

Taken at the
Office of Mark B. Hanson
Attorney at Law
Second Floor, Macaranas Building
Beach Road, Garapan
Saipan, Mariana Islands 96950

April 9, 2008

APPEARANCES:

1. MARK B. HANSON, ESQ.
First Floor, Macaranas Building
Beach Road, Garapan
PMB 738, Box 10,000
Saipan, Mariana Islands 96950

Attorney for Plaintiffs/Notary Public
2. KELLEY M. BUTCHER, ESQ.
Law Office of G. Anthony Long
P.O. Box 504970
Saipan, Mariana Islands 96950

Attorney for Deponent and Defendant KSK Corporation
3. MS. KIM SUNG EUN
PMB 234, P.O. Box 10,001
Saipan, Mariana Islands 96950

Deponent
4. MR. KIM KI SUNG
PMB 234, P.O. Box 10,001
Saipan, Mariana Islands 96950

Defendant
5. MS. MIO KIM
P.O. Box 501248
Saipan, Mariana Islands 96950

Official Translator (Korean)

STIPULATIONS: None.

1 KIM SUNG EUN,

2 having first been duly sworn by the Notary Public Mark B. Hanson, was examined

3 and testified as follows:

4 EXAMINATION BY

5 MR. HANSON:

6 MR. HANSON: Okay, we're on the record of a deposition in the case of Li Ying
7 Hua, Li Zheng Zhe and Xu Jing Ji vs. Jung Jin Corporation, *et al.*, Civil Case No. 05-0019
8 currently pending in the United States District Court for the Northern Marian Islands. This is
9 the day scheduled for the deposition of Ms. Kim Sung Eun, K-i-m S-u-n-g E-u-n. This is
10 Mark Hanson, the attorney for the plaintiffs. I will also be the officer for the deposition. The
11 time is approximately 10:15 on Wednesday, April 9, 2008. We are in the offices of – my
12 offices, on the 2nd floor of the Marianas Building. The deponent is here with her attorney,
13 Kelley Butcher, from the law offices of G. Anthony Long. Mr. Kim Ki Sung, one of the
14 defendants in the case, is also present as is the translator for the deposition, Ms. Mio Kim.
15 Ms. Kim, how do you spell your first name?

16 MS. MIO KIM: M-i-o.

17 MR. HANSON: M-i-o K-i-m. The first thing I'd like to do is swear in the translator
18 so can you raise your right hand? Do you swear to translate from English into Korean and
19 from Korean into English to the best of your abilities today?

20 MS: MIO KIM: Yes.

21 MR. HANSON: Now I'm going to swear in the witness. Ms. Kim, I'm going to put
22 under oath. Can you raise your right hand for me? Wait for the translation too.

1 Q. Do you swear to tell the truth, the whole truth and nothing but the truth in this
2 deposition?

3 A. Okay.

4 Q. Now you're under oath. You can put your hand down. I'm a notary public for
5 the Commonwealth so you're under oath.

6 MR. HANSON: Does the deponent have any objection to me being the officer for the
7 deposition?

8 MS. BUTCHER: No objection.

9 MR. HANSON: Okay.

10 Q. Now Mrs. Kim, can you please state your full name for the record?

11 A. Kim Sung Eun.

12 Q. Is that K-i-m S-u-n-g E-u-n? Is that correct?

13 A. Yes.

14 MR. HANSON: You'll need to speak up a little. What we're doing today is we're
15 recording this by audio. We're also taking a video of that and later on after the deposition is
16 finished we might turn what you say today into a transcript. Okay. Now my name is Mark
17 Hanson; I think we've probably met before.

18 A. DEPONENT (in English): Yeah.

19 MR. HANSON: As you know I represent three former employees of the Mr. Kim
20 Hang Kwon and Park Hwa Sun and their two companies. And as I told you this is Ms. Mio
21 Kim; she's going to be the translator today. It's very important that you understand the
22 questions that I'm asking, because your answers are very important to me so I want you to be

1 sure that you – that you understand the question that's being asked, and if you don't you can
2 ask me to clarify it. Okay?

3 A. DEPONENT (in English): Okay.

4 Q. Don't be afraid to say I – I don't understand what you just asked.

5 A. DEPONENT (in English): Okay.

6 Q. Also if there's any time you want to take a break, if you feel uncomfortable or
7 you need to go to the bathroom, just let me know and we can take a break.

8 A. DEPONENT (in English): Okay.

9 Q. But basically I'm just going to ask you questions about certain things and –
10 and you just respond truthfully and – and that will be it.

11 A. DEPONENT (in English): Okay.

12 Q. Okay?

13 A. Okay?

14 Q. Do you have any questions about what's going to happen before we start?

15 A. No.

16 Q. Okay. Are you on any medication or under the influence of alcohol or any
17 other narcotics today?

18 A. [no audible reply].

19 Q. I just need to make sure you're – you're not sick or anything?

20 A. [No audible reply]

21 Q. Is your mind clear today?

22 A. [No audible reply]

1 Q. Now before you came here today did you talk to anybody about what you were
2 going to talk about, what – what sort of things you were going to say in the deposition today?

3 A. No.

4 Q. Did you have a meeting with your attorney, for example?

5 A. No.

6 Q. Mr. Kim Ki Sung is your husband, correct?

7 A. Yes.

8 Q. Is that correct? That's correct.

9 A. [No audible reply]

10 Q. Did you and Mr. Kim, and I'll call him Mr. Kim, did you – did you talk about
11 today, your deposition here today?

12 A. No, not much to talk about. We live together. Nothing to talk about.

13 Q. You didn't talk about what questions may be asked, or the questions I would
14 ask today?

15 A. No. She doesn't know – she doesn't know what she's going to be asked.

16 Q. Did you – did you bring any documents with you?

17 A. No, we didn't bring.

18 Q. Okay. You know what, I – I asked you to bring documents with you when I
19 gave you the papers to – to have you come for a deposition, right?

20 A. She didn't – she didn't hear it. I didn't hear it.

21 Q. Alright. Well, I'll talk to you about that later. You – when did you first come
22 to Saipan?

23 A. 2002 November.

1 Q. November 2002. Okay. Mr. Kim, you can only observe. You can't say
2 anything, okay? You'll have your chance later but today, right now we're talking to your
3 wife. Was your -- your -- your husband in Saipan before you came to Saipan?

4 A. Together.

5 Q. You came together, for the first time?

6 A. Yes, came together first time.

7 Q. And when you came did you come as a tourist or did you come -- under what
8 kind of visa did you first enter Saipan?

9 A. Joint visa. Joint visa. As a -- as a...

10 Q. Can you spell that for me, what you're saying?

11 A. Joint visa.

12 Q. Joint visa. And that was in November 2002?

13 A. I think so. It's already been about 5 years.

14 Q. Before -- when you were married to Mr. Kim? When did you get married?

15 A. '87.

16 Q. Before you came to Saipan were you working in Korea? Did you have a job?

17 A. No.

18 Q. When you came to Saipan did you bring any money with you?

19 A. Yes.

20 Q. How much money did you bring with you?

21 A. I can't remember but my husband invested money in Managaha venture.

22 Q. Do you know how much money?

23 A. Maybe about 200,000.

1 Q. And when was that? In 2002?

2 A. 2002 when my husband was investing money in Managaha Shop.

3 Q. Okay. The \$200,000, did you bring, you and your husband bring that in as
4 cash?

5 A. Cash.

6 Q. That 200,000 that was invested, is that the only money you brought or was
7 there more money?

8 A. I can't remember, but that sounds about right. About 200,000.

9 Q. About 200,000. Was all of the money that you brought from Korea invested
10 into the Managaha venture?

11 A. Because I wasn't working my husband took care of all the investments but
12 that's how much we brought in.

13 Q. 200,000?

14 A. About that much. About that much. I invested in different places.

15 Q. In different places. What different places?

16 A. I don't know because I wasn't carrying the money on myself. My husband
17 took care of that. My husband brought in that much.

18 Q. When you came to Saipan and brought this money, did you leave any money
19 in Korea in cash or in a bank?

20 A. Because my husband took care of all the investments I don't know exactly but
21 she – they left some money in – in Korea as well.

22 Q. Do you know how much money you left in Korea?

23 A. No, [unclear]. I don't know.

1 Q. Just to be clear, when you say your husband, you're talking about Mr. Kim Ki
2 Sung, is that correct?

3 A. Yes.

4 Q. You were married in 1987 to Mr. Kim Ki Sung?

5 A. Yes.

6 Q. And you're not divorced?

7 A. No.

8 Q. So you haven't had any other husbands?

9 A. [No audible reply]

10 Q. Just to be clear so that when we go back later I can tell when you say husband
11 I can be sure that we're talking about only Mr. Kim Ki Sung?

12 A. [No audible reply]

13 Q. So this \$200,000, where did that – where did that come from? Do you know
14 where that money came from?

15 A. She sold the house and she wanted to bring her kids to school here and that's
16 why she came with her husband.

17 Q. So the 200,000 came from the sale of a house, is that correct?

18 A. Yes.

19 Q. How much did you sell the house for?

20 A. In Korean it's about 3.9 or 390,000 – 390,000.

21 Q. Three-nine-zero-zero-zero-zero?

22 A. Three four – three four.

23 Q. Three-four zero? 340,000 dollars – or Korean won, is that right?

1 A. Yes.

2 Q. When did you sell the house?

3 A. In 2002. Before she came here to come to Saipan.

4 Q. Okay. Before you sold the house, how much money did you and your husband
5 have in savings.

6 A. I don't know the full amount because my husband is the one with – better with
7 the money situation.

8 Q. Did you and your husband sell any other property before you came to Saipan?

9 A. No.

10 Q. Just the house?

11 A. Yes.

12 Q. When you came to Saipan did you – did you work? Did you get a job?

13 A. Even before came here – do you mean here?

14 Q. When she came to Saipan – when you came to Saipan in 2002, did you get a
15 job?

16 A. I could not because she – she – I'm not a position to work here.

17 Q. Why are you not in a position to work?

18 A. Because of the visa situation.

19 Q. What – have you had the same visa the whole time you've been in Saipan?

20 A. Yes.

21 Q. And what type of visa is that?

22 A. Joint visa.

23 Q. When you say joint do you mean like an immediate relative permit?

1 A. Because of the joint spouse visa.

2 Q. So Mr. Kim, your husband, is sponsoring you as an immediate relative?

3 A. Yes.

4 Q. And Mr. Kim is employed by KSK Corporation, is that right?

5 A. Yes.

6 Q. And you are the owner of KSK Corporation, is that right?

7 A. Yes.

8 Q. Is there somebody that – is there a company that when you first came to
9 Saipan, just you and your husband and processing your visa application?

10 A. Offices – like some sort of office.

11 Q. Do you know what the name of that office is?

12 A. I don't remember the name. I just wanted sign about my husband.

13 Q. Do you know where it's located?

14 A. I don't know for sure.

15 Q. How many – have you gone there more than one time to sign documents?

16 A. Several times. She went with her husband on his car several times.

17 Q. Can you speak up a little bit louder for me? The air time is going to cause
18 problems with the recording. And you don't – you've gone there several times but you're not
19 sure what – where it's located?

20 A. Past the post office but that's all I remember.

21 Q. Now I'm going to ask you some questions about KSK Corporation.

22 A. Yes.

1 Q. Do you know when KSK Corporation was formed, when – when it was
2 incorporated?

3 A. Maybe 3 years.

4 Q. Do you know what year it was incorporated?

5 A. I don't know.

6 Q. You're – you're a shareholder in KSK, is that right?

7 A. Yes.

8 Q. How many shares do you own in the company?

9 A. I don't know.

10 Q. Are there any other shareholders in the company?

11 A. No.

12 Q. There are no other shareholders of KSK Corporation?

13 A. I remember my mom and...

14 Q. Okay. Is your mother a shareholder of the corporation?

15 A. Yes.

16 Q. How many shares in the company does your mother own?

17 A. I don't know.

18 Q. Who owns more shares, you or your mother?

19 A. I don't know. Maybe me.

20 Q. How much of a percentage ownership of KSK Corporation do you own?

21 A. [No audible reply]

22 Q. Speak up. What was her response?

23 A. No.

1 Q. No? I...

2 A. TRANSLATOR: She said no. I don't know.

3 Q. You don't know? How much money did you pay for your ownership interest
4 in KSK Corporation?

5 A. Because my husband takes care of all that. I don't – I don't know.

6 Q. You don't know how much money you paid for your shares, for your stock, in
7 KSK Corporation?

8 A. No.

9 Q. Are you a director of KSK Corporation?

10 A. No.

11 Q. Right now who else is a director of KSK Corporation?

12 A. My mother and me.

13 Q. Now you've mentioned your mother as a shareholder and a director, what's
14 her name?

15 A. Kim Ok Ja.

16 Q. Are there any other – so Kim Ok Ja is your mother and she's a director and
17 you're a director, are there any other directors?

18 A. No.

19 Q. Are you an officer of KSK Corporation?

20 A. No, my husband acts as an officer.

21 Q. When you say your husband acts as an officer, what kind of officer does he act
22 as?

23 A. KSK's manager.

1 Q. Are there any other officers of KSK Corporation?

2 A. No.

3 Q. Do you have any other positions with KSK Corporation besides director and
4 shareholder?

5 A. Because I have a joint visa I don't have any other – other official positions for
6 the company.

7 Q. Do you have any unofficial positions for the company?

8 A. I come in as a person who just signs the documents when my – when my
9 husband asks, but actual working I'm not doing.

10 Q. What – what sort of documents does your husband ask you to sign?

11 A. Because I'm the owner I sign like for the bank.

12 Q. What else?

13 A. And other documents.

14 Q. What kind of other documents?

15 A. For instance, my husband comes in. He asks me what to sign then I will sign.

16 Q. Now he asks you what to sign or he tells you to sign a document?

17 A. I sign because I, I am part of the company, not because he forced me to.

18 Q. Do you understand when you sign a document what the document says?

19 A. My husband explains what kind of documents they are.

20 Q. Do you read English?

21 A. No, I don't but my husband gets some sort of translation from – from another
22 office, then I sign.

23 Q. What office does your husband get a translation from?

1 A. Office.

2 Q. Do you know the name of the office?

3 A. I don't know.

4 Q. Does your husband get a translation for every document that you – that he has
5 you sign?

6 A. Yeah, most of the documents but if not then I ask my daughter, close-by
7 friends to translate before I sign.

8 Q. Now these translations, are they written translations of what documents your
9 husband asks you to sign?

10 A. Yes.

11 Q. Do you keep copies of those written translations?

12 A. No, I don't.

13 Q. What do you do with the written translation after you read it?

14 A. I read the notes and I read the translation and sign.

15 Q. Then what happens to the written translation?

16 A. When my husband bring in the translation or translate the documents then I
17 sign.

18 Q. I understand. What I'm asking is after you sign the English, when you have
19 the written Korean translation, what do you do with that paper?

20 A. Okay. My husband translates the documents then I sign.

21 Q. So your husband reads you what the document says and then asks you to sign
22 it?

23 A. Yes.

1 Q. What about this company that you said prepares written translations of the
2 documents? What documents do they provide written translations for?

3 A. Okay. My husband goes to the office, gets a translator from the office and
4 then from there she comes up to me and he translates it to me and then I sign.

5 Q. So I'm just trying to understand. Your husband takes the English document,
6 takes it to this company – you don't know the name – and they prepare a written translation?

7 OBJECTION: Misstates testimony.

8 Q. I'm just trying to clarify. Is that – is that correct?

9 A. Yes, but not written.

10 Q. Okay. So your husband takes a document and goes and asks somebody what it
11 says, what does this say in English and they tell him what it says and then he comes and tells
12 you what they said?

13 A. Yes.

14 Q. And then you sign it?

15 A. Yes.

16 Q. Do you have any other duties for KSK Corporation besides signing papers that
17 Mr. Kim asks you to sign?

18 A. No.

19 Q. No other duties?

20 A. No.

21 Q. Do you – do you sign checks?

22 A. Yes.

23 Q. Right now where does KSK Corporation have bank accounts?

1 A. Saipan Bank.

2 Q. Has KSK always done Bank of Saipan as...

3 A. Yes, Bank of Saipan.

4 Q. How long...

5 A. Currently.

6 Q. Let me rephrase my question. How long has KSK Corporation had an account
7 at the Bank of Saipan?

8 A. About 3 years. I don't know when.

9 Q. Did KSK have any other bank accounts in the past?

10 A. Yes.

11 Q. Where?

12 A. TRANSLATOR: No. I'm sorry. No.

13 Q. First of all, does KSK have any other bank accounts right now besides the
14 Bank of Saipan?

15 A. We're only using the Bank of Saipan now so I don't think we have any other
16 account.

17 Q. How about before? When the company first opened, was the account for the
18 company at the Bank of Saipan?

19 A. At first maybe Hawaiian Bank.

20 Q. I'm sorry, say that again?

21 A. Hawaii Bank.

22 Q. Bank of Hawaii.

23 A. Bank of Hawaii. When first the company was opened first, Bank of Hawaii.

1 Q. For how long did you have the account at the Bank of Hawaii – the company
2 have the...

3 A. I don't know.

4 Q. Why did you change from – why the company, KSK Corporation, change from
5 Bank of Hawaii to Bank of Saipan?

6 A. At the time my husband was out – out of Saipan in Korea and things somehow
7 they don't work out so we changed.

8 Q. When – who was the person that prepared the documents, the paperwork, to
9 start KSK Corporation?

10 A. He's not here now but Choi Woo Bak.

11 Q. I'm sorry, can you spell that for me please?

12 A. Choi Woo Bak.

13 Q. Spelled?

14 A. TRANSLATOR: C-h-a-e maybe, W-o-o B-a-k – B-a-e-k.

15 Q. P-a-e...

16 A. TRANSLATOR: B, B as in baby.

17 Q. And who is – who is Choi Woo Bak?

18 A. Somebody that my husband knows because my husband didn't know anybody
19 here to start the bank and the company.

20 Q. Does Mr. Choi have a business in Saipan, or did he at the time that this KSK
21 Corporation was started?

22 A. [Indistinct]

23 Q. But Mr. Choi is not in Saipan any more?

1 A. No.

2 Q. Do you know where he is?

3 A. No.

4 Q. [To translator]: Remember, you're the one that's going to get recorded here.

5 Q. Did you have to sign any documents to start the KSK Corporation?

6 A. I don't remember, but yes.

7 Q. You don't remember or yes? Which one?

8 A. I don't remember.

9 Q. You said you don't remember how much money you paid for your ownership
10 of KSK Corporation, is that right?

11 A. Yes.

12 Q. Did your husband give money to the company on your behalf? Do you know?

13 A. I don't know.

14 Q. When -- when the bank account was first opened for KSK Corporation at Bank
15 of Hawaii do you know what the initial deposit was?

16 A. I don't remember.

17 Q. When the company first started doing business, when was that?

18 A. I don't remember exactly.

19 Q. What -- what business did the company first start in Saipan?

20 A. At first we got money, we didn't open up a business. We invested the money
21 to the Managaha Shop.

22 Q. And how long did that investment -- did you ever get your money back from
23 the Managaha Shop?

1 A. Yes, I did. We took it back.

2 Q. When was that that you got the money back?

3 A. I don't remember.

4 Q. But you initially put about \$200,000 in, in November 2002, right?

5 A. Yes.

6 Q. How long was it after...

7 A. I brought 100,000 in, but I'm not saying I invested all that money into
8 Managaha Shop. I left some money...

9 Q. Okay. How much money was invested in the Managaha Shop?

10 A. 150,000.

11 Q. And then at some point in time you got money back from the Managaha Shop,
12 is that right?

13 A. Yes, I did receive it back.

14 Q. You received all that 150,000 back?

15 A. Yes, \$150,000 back.

16 Q. Just your original investment?

17 A. Yes.

18 Q. Did you get any interest or any additional money besides the 150 for the
19 investment?

20 A. Yes.

21 Q. How much more did you get back from the Managaha Shop?

22 A. Just the money that I invested.

1 Q. So 150 into the Managaha Shop and then eventually you got \$150,000 back
2 from the Managaha Shop?

3 A. [no audible response]

4 Q. The 50,000 more that you brought in cash from Korea, what did you do with
5 that money?

6 A. Use up for daily life. I didn't – I didn't use that money because I'm not – I – I
7 wasn't working. My husband took care of all the money situation. Maybe my husband
8 invested that money into something else too.

9 Q. So you don't know what happened to the 50,000?

10 A. Yes.

11 Q. What does KSK stand for?

12 A. My husband's name.

13 Q. Do you know a Kim Mi Suk ?

14 A. [No audible reply]

15 Q. Kim Mi Suk?

16 A. No, actually...

17 Q. That's your employee, [to Kim Ki Sung: "Mr. Kim please"] an employee for
18 KSK Corporation?

19 A. Yes, KSK Corporation employee.

20 Q. And what position does Kim Me Suk – and for the record that's K-i-m M-i S-
21 u-k. What – is that a man or a woman?

22 A. Female.

23 Q. What position does she hold with KSK Corporation?

1 A. The position next to manager.

2 Q. Like a supervisor?

3 A. Supervisor, yes.

4 Q. How long – is Kim Mi Suk working for the company now?

5 A. Yes.

6 Q. How long has Kim Mi Suk been working for the company?

7 A. Two years. I'm not sure.

8 Q. Has she always been a supervisor?

9 A. Yes.

10 Q. Who is Seo Yong Ki?

11 A. Somebody my husband knows.

12 Q. Is that a man or a woman?

13 A. Male.

14 Q. A man?

15 A. Male.

16 Q. For the record that's S-e-o Y-o-n-g K-i. It's a man that your husband knows.

17 Do you know...

18 A. Yes, my husband.

19 Q. Do you know what Mr. Seo does? What's his job?

20 A. Before he used to own the restaurant but now I don't know.

21 Q. Own what restaurant? Do you know the name?

22 A. Chang Won.

23 Q. How do you spell that?

- 1 A. C-h-a-n-g W-o-n.
- 2 Q. So the one across from Moon Night, is that right?
- 3 A. Yes.
- 4 Q. How about Park Ae Ja?
- 5 A. No, I don't know.
- 6 Q. Have you heard of a company called Ok Corporation?
- 7 A. I don't know.
- 8 Q. How many employees does KSK Corporation have right now?
- 9 A. Four.
- 10 Q. How many supervisors?
- 11 A. One.
- 12 Q. And that's Kim Mi Suk?
- 13 A. Yes.
- 14 Q. What businesses does KSK Corporation have right now?
- 15 A. Poker and laundry.
- 16 Q. How many poker parlors? Is that right?
- 17 A. Poker.
- 18 Q. How many poker rooms? How many poker rooms?
- 19 A. One. Two laundry.
- 20 Q. Two laundries? Where is the poker room?
- 21 A. Chalan Kanoa.
- 22 Q. Did that used to be Welcome Poker?
- 23 A. Yes.

1 Q. And two laundry rooms. Where are they located?

2 A. Both of them are in Chalan Kanoa.

3 Q. Is it one of them that used to be the Welcome Laundry?

4 A. Yes.

5 Q. And the other one is – is that a new laundromat?

6 A. Yes.

7 Q. Where – and that's located also in Chalan Kanoa?

8 A. Yes.

9 Q. Did you start that laundry – did the KSK Corporation start that laundry from
10 scratch, from – start it new or did it buy the company from somebody else – buy the – the
11 laundry...

12 A. [No audible reply]

13 Q. Do you understand the question?

14 A. I renovated the market into laundry.

15 Q. What market was it?

16 A. I don't know.

17 Q. How much money did – when was that that you did the renovation of a
18 market?

19 A. This year.

20 Q. In 2008?

21 A. 2007.

22 Q. When in 2007?

23 A. I cannot remember when exactly but 2007.

1 Q. Well is it in the middle of 2007? Was it summertime or was it towards
2 Christmas time or Thanksgiving?

3 A. It was another church from Tanapag, they – they brought those things into
4 Chalan Kanoa.

5 Q. Okay, when was that?

6 A. 2007.

7 Q. When?

8 A. July, August, June maybe.

9 Q. So – so you say the machines came from some place in Tanapag, is that right?

10 A. TRANSLATOR: Yes. From Tanapag.

11 Q. Was it from a laundromat in Tanapag that was closing?

12 A. Yes.

13 Q. Does KSK own 100 per cent of this business or is it a partnership?

14 A. No other share.

15 Q. Does this – let's go back for a minute. Seo Yong Ki, does he have anything to
16 do with KSK Corporation?

17 A. No. Not related.

18 Q. Do you have – is one of the 12 employees of KSK Corporation an accountant
19 or a bookkeeper?

20 A. No.

21 Q. Who prepares your tax documents for – for KSK Corporation?

22 A. Office.

23 Q. What office?

1 A. My husband knows.

2 Q. Do you know the name of the office that prepares the taxes for KSK
3 Corporation?

4 A. I don't know the office.

5 Q. You don't know the name?

6 A. Owns. Owns.

7 Q. Can you spell that for me?

8 A. Owns. Owns in Chalan Kanoa.

9 Q. Owns like . . . ?

10 A. TRANSLATOR: I don't – I don't – maybe O-n-s, I don't know. Maybe
11 Ones.

12 Q. Let's talk about your husband. What's his position with KSK Corporation?

13 A. Manager.

14 Q. Does he basically run the company?

15 A. My husband takes care of all that because I cannot work.

16 Q. You can only sign documents, is that right?

17 A. Yes.

18 Q. Besides KSK Corporation, does your husband have any other – does he work
19 for any other company?

20 A. No.

21 Q. Does he have any other businesses on the side?

22 A. No.

23 Q. Does he have any . . . does he do apartment rental or property management?

1 MS. BUTCHER: I object to this line of questioning. If it has to do with KSK
2 Corporation . . . [unclear] . . . tomorrow . . . [unclear] . . . Mr. Kim . . . [unclear].

3 Q. You can still answer the question. What other businesses do you know that
4 your husband has?

5 A. I don't understand what you mean by working another – working another
6 business or having another business.

7 Q. Well for example you remember Daora Poker? Do you remember Daora
8 Poker?

9 A. Yes.

10 Q. Did your husband have any – any – any interest in that, any ownership?

11 A. Partnership.

12 Q. That was the partnership with your husband and...

13 A. It was – this was a long time ago, but not now.

14 Q. Okay, but a long time ago your husband had a partnership with somebody else,
15 is that right?

16 A. Yes.

17 Q. But that wasn't KSK Corporation, right?

18 A. Not related.

19 Q. So what I'm asking you is now does he have any partnerships like that or any
20 other business interests that aren't KSK Corporation?

21 A. No.

22 Q. You guys, where do you live?

23 A. San Vicente.

1 Q. You have a big building in San Vicente, is that right?

2 A. Yes, a two-storey building.

3 Q. Who – who owns the building? Who is the owner?

4 A. I think my husband.

5 Q. He had to pay a lot of money for the building?

6 A. Yes.

7 Q. When did he have to pay a lot of money for the building?

8 A. [indiscernible]

9 Q. How long – how long have you lived in the building?

10 A. About 3 years.

11 Q. Did you live in the building before your husband bought the building?

12 A. No.

13 Q. Did you move in right after your husband bought the building?

14 A. No, I rented the space out – my husband rented the space out to someone else

15 and then afterward.

16 Q. How long did you rent the space out to someone else before you moved in?

17 A. I don't remember. I just took care of the housework.

18 MS. BUTCHER: I'm sorry, I didn't hear that.

19 A. TRANSLATOR: I just took care of the housework.

20 Q. So, KSK didn't buy the building, is that right?

21 A. With the money from the KSK Corporation.

22 Q. But you said your husband was the owner of the building, is that right?

23 A. I think my husband, yes.

1 Q. So, your husband is the owner but he used money from KSK to buy the
2 building, is that right?

3 A. Yes. We didn't have enough money so maybe my husband borrowed money
4 from someone else.

5 Q. Earlier you confirmed that it cost a lot of money? How money did the San
6 Vicente building cost?

7 A. About 250,000.

8 Q. So your husband paid \$250,000 in cash for the San Vicente building?

9 A. Yes.

10 Q. How much money of that \$250,000 was from KSK?

11 A. I don't know. Not from KSK, but he borrowed money from another people.

12 Q. He borrowed the entire \$250,000 from some – some other people?

13 A. I don't know. I don't remember for sure.

14 Q. Do you know who – you don't know if he borrowed money from other people?

15 OBJECTION: Speculation.

16 A. From somebody my husband knows. Maybe Seo Yong Ki.

17 Q. I'm sorry, can you say that again? Maybe who?

18 A. Maybe Seo Yong Ki.

19 Q. Seo Yong Ki?

20 A. Yes.

21 Q. The one I mentioned earlier, S-e-o Y-o-n-g K-i? So you think he might have
22 borrowed money from Seo Yong Ki to buy the building?

23 A. Yes, I think so.

1 Q. Earlier you said it's money from KSK. Do you know if any money was used
2 from KSK to buy that building?

3 A. I don't know.

4 Q. You don't know if any money from KSK was used? Is that what you're
5 saying?

6 A. I don't know.

7 Q. Did Mr. Kim have any – did your husband have any of his money that he used
8 to buy the building?

9 A. My husband took care of that, so I don't know.

10 Q. Does your husband have his own money separate from KSK?

11 OBJECTION: Speculation.

12 A. I don't know.

13 Q. Does your husband use KSK money for things that are only in his name?

14 OBJECTION: Speculation.

15 A. I don't know.

16 Q. Do you know Susupe property before Mr. Kim and Ms. Park's property?

17 A. Yes.

18 Q. Mr. Kim bought that at the auction. Do you remember that?

19 A. Yes.

20 Q. Right? Do you know what I'm talking about?

21 A. Yes.

22 Q. Where did Mr. Kim get the money to buy that?

23 A. I didn't go there. My husband went. My husband took care of that.

1 Q. I understand. Do you know where he got the money to pay for that?

2 A. I don't know.

3 Q. Could it have come for KSK Corporation?

4 OBJECTION: Speculation.

5 A. Yes. I don't know, sorry.

6 MS. BUTCHER: It's . . .

7 MR. HANSON: . . . been an hour.

8 MS. BUTCHER: Yeah.

9 Q. You need to take a break? Do you want to take a break?

10 A. Yes.

11 Q. Okay. It's approximately 11:15 and we'll go off record for a 10 minute break.

12 [BREAK 01:01:15]

13 MR. HANSON:

14 Q. Okay, we're back on the record after a short break. The time is now 11:29.

15 We're continuing with the deposition of Ms. Kim Sung Eun and all the same people are

16 present as before the break. Ms. Kim, before we broke we were talking about some property

17 that your husband, Mr. Kim – that – some of the property he had in Saipan. Does the KSK

18 Corporation own any property in Saipan or have any leases on any property in Saipan?

19 A. I don't know.

20 Q. You don't know?

21 A. TRANSLATOR: I don't think so.

22 Q. She said, "I don't think so"?

23 A. TRANSLATOR: I don't think so.

1 Q. Okay. As a director, you said there are two directors of KSK Corporation, is
2 that right?

3 A. Yes.

4 Q. Do you – and that's – the other one is your mother, right?

5 A. Yes.

6 Q. Do you and your mother ever have any meetings to discuss the business of
7 KSK Corporation?

8 A. No.

9 Q. Have you ever talked to your mother about KSK Corporation business?

10 A. She's – she's old.

11 Q. Does she have anything to do with the business of KSK Corporation?

12 A. No.

13 Q. Do you and Mr. Kim have meetings to discuss the business of KSK
14 Corporation?

15 A. Me and my husband?

16 Q. Yes.

17 A. Yes. Not – not specifically but how the business goes, we talk about it.

18 Q. What sort of things do you talk about with your husband about how the
19 business goes?

20 A. Not – not specifically but how the business doing well, not . . . I just run the –
21 run the household.

22 Q. You run the household?

23 A. Yes.

1 Q. And Mr. Kim runs the business? Your husband, Kim Ki Sung runs the
2 business?

3 A. Yes.

4 Q. But you don't have -- have anything to do with the running of the business, is
5 that right?

6 A. Yes.

7 Q. Do you know if, does KSK Corporation owe anybody money?

8 A. I don't know.

9 Q. Has KSK Corporation taken out any loans?

10 A. I don't remember, but I remember he was getting a loan so I signed for it.

11 Q. Who was getting the loan?

12 A. My husband.

13 Q. Your husband was getting the loan and you signed for it?

14 A. Yes.

15 Q. Do you know when that was?

16 A. I don't remember.

17 Q. Do you know . . .

18 A. Maybe three years.

19 Q. If your husband was getting the loan, why did you have to sign?

20 A. My husband talk about maybe opening a bakery shop with her so I -- I knew
21 how much I knew that we needed more money so he was asking for a loan in the bank.

22 Q. Was your husband who was asking for the loan or was it KSK Corporation that
23 was asking for the loan?

1 A. My husband. I don't know.

2 Q. Does your husband – you just said that your husband doesn't have any other
3 businesses.

4 A. Back then we were trying to have another business, but not now.

5 Q. Okay. Does your husband have a bakery shop?

6 A. No.

7 Q. Has your husband ever had a bakery shop?

8 A. No. We were trying to open up [indistinct]. We were trying to get a loan for
9 the bakery but we never did.

10 Q. You never got the loan?

11 A. He – we – we got the loan for the bakery, but we never opened a bakery shop.

12 Q. How much was the loan? How much money for...

13 A. Maybe 100,000. I don't remember.

14 Q. And that was to open up a bakery shop?

15 A. Yes.

16 Q. What happened to the money?

17 A. I tried to open up . . .

18 Q. [to translator]: Translate what she said first.

19 A. Okay, as she remember – as she remember they got the – I got the loan money
20 from the bank and because we didn't open up the bakery shop my husband might have repaid
21 whoever he borrowed the money from. Maybe Mr. Seo Yong Ki.

22 Q. Borrowed what money from?

- 1 A. TRANSLATOR: Whatever the money that he borrowed from Mr. Seo Yong
2 Ki.
- 3 Q. So you think your husband borrowed money from Seo Yong Ki and used the –
4 the bank loan? Was it a bank loan?
- 5 A. Yes.
- 6 Q. The \$100,000 was a bank loan, right?
- 7 A. Yes.
- 8 Q. Do you know from what bank?
- 9 A. I don't remember but I went to Garapan to sign.
- 10 Q. You don't know the name of the bank though?
- 11 A. No.
- 12 Q. So you think your husband used the money from the bank loan to pay back
13 Seo Yong Kim - Seo Yong Ki, the money that he owed him?
- 14 A. Yes.
- 15 Q. Okay. Out of that \$100,000 did you get any part of that -- that loan?
- 16 A. No, I didn't use any of that money.
- 17 Q. Was any of that money used in a business of KSK?
- 18 A. No, my husband took care of all of that. I don't know.
- 19 Q. Do you know Kim Hang Kwon and Park Hwa Sun?
- 20 A. Yeah, I saw them two times.
- 21 Q. Have you ever -- are -- are they friends of yours?
- 22 A. Just [unclear] from Saipan.
- 23 Q. Do you ever see them socially?

1 A. Not really. I just met them a few times.

2 Q. Do you play golf?

3 A. My husband met them from golf.

4 Q. Did you ever play golf with them?

5 A. No.

6 Q. Have you seen either Mr. Kim or Ms. Park lately?

7 A. No.

8 Q. When was the last time you saw Kim Hang Kwon?

9 A. I cannot remember.

10 Q. Do you know if he's in Saipan right now?

11 A. I don't know.

12 Q. Has your husband ever talked to you about Mr. Kim Hang Kwon or Park Hwa
13 Sun?

14 A. Not recently.

15 Q. Did – did you ever loan any money to Kim Hang Kwon or Park Hwa Sun?

16 A. Not now but before. My husband lent some money.

17 Q. Your husband loaned some money to – to who, Mr. Kim Hang Kwon or Park
18 Hwa Sun, or both?

19 A. I don't know.

20 Q. You – you don't know if it was either or both but you – you know that he
21 loaned money to at least one of them?

22 A. Yes.

1 Q. Okay. Did you personally, you Mrs. Kim, ever give – give Mr. Kim Hang
2 Kwon or Ms. Park Hwa Sun any money?

3 A. No. Not – not from me.

4 Q. Did KSK Corporation ever give Kim Hang Kwon or Park Hwa Sun any money
5 for any reason?

6 A. No. No.

7 TRANSLATOR: But just this is hard to explain this. Korean community have sort of
8 like a bank loan thing, a group – you – several – several people get together...

9 Q. [to translator]: Are you explaining or are you translating?

10 A. TRANSLATOR: I'm explaining.

11 Q. Don't explain.

12 A. TRANSLATOR: Okay.

13 A. Maybe from Kae money.

14 Q. Okay, what's Kae money?

15 A. It's – it's hard to explain. It's hard to explain.

16 Q. Well first of all, Kae – what is Kae – explain to me what Kae money is?

17 A. Putting in the little money by several people and getting the lump sum out. It's
18 kind of like an investment – it's just like a bank account, like a cd.

19 Q. Okay, everybody puts in a little bit of money over a period of time and then at
20 the end gets a lump sum?

21 A. Anytime. They – they take a number and they – they get picked, then that
22 person gets the money.

1 Q. And KSK Corporation has something to do with this – what was the name of
2 it?

3 A. TRANSLATOR: Kae.

4 Q. Kae? What...

5 A. TRANSLATOR: Kae. K-a-e.

6 Q. K-a-e.

7 A. TRANSLATOR: Kae.

8 Q. Kae?

9 A. TRANSLATOR: Yes.

10 Q. KSK Corporation has something to do with the Kae?

11 A. No, I don't think so. Not related. How – how would I know?

12 Q. Well, when I asked you...

13 A. I – I don't understand.

14 Q. Okay. When I asked you if KSK Corporation had ever given Kim Hang Kwon
15 or Park Hwa Sun any money you responded, "Maybe the Kae ..."

16 A. Yes.

17 Q. Okay. So what does KSK Corporation have to do with the Kae?

18 A. Only because you asked me if I – if I lent – loaned the money to these people.

19 Q. So you're talking about you now, Mrs. Kim.

20 A. Not me but maybe my husband.

21 Q. Alright, Kae is – wasn't there another word, Kae-something you were saying?

22 A. TRANSLATOR: Kae ton, it's the Kae money.

1 Q. Okay, Kae money. Kae money from the Kae – the Kae. You just call it the
2 Kae, is that right?

3 A. TRANSLATOR: Yes.

4 Q. Did you ever put money into the Kae, you Mrs. Kim?

5 A. Yes.

6 Q. Okay. How money did you put into the Kae?

7 A. Two, so 4,000 together.

8 Q. I'm sorry?

9 A. Two Kae.

10 Q. Two, alright, Kae, two Kae. Two times you did this, is that right?

11 A. Yes.

12 Q. And each time you put in 2,000?

13 A. Yes.

14 Q. Alright. Where did you get the 2,000 to put into the Kae each time?

15 A. From my husband.

16 Q. Your husband gave you the money to put into the Kae?

17 A. Yes.

18 Q. Where did he get the money to give you to put into the Kae?

19 A. I don't know. My husband gave it to me.

20 Q. Did your husband ever put any money into the Kae?

21 A. No.

22 Q. Only you?

23 A. Yes.

1 Q. And you think that – how much money when you put in \$2,000 well just one
2 time into – into a Kae, how much is this lump sum that you're supposed to get?

3 A. 60,000.

4 Q. 60,000. So you would put in two...

5 A. 6,000 each.

6 Q. Each person that puts in \$2,000 gets out \$60,000?

7 A. Yes, that's with the interest.

8 Q. How does the Kae earn interest?

9 A. One Kae ends up having \$60,000 so 600 each. That's how Koreans play the
10 money.

11 Q. One Kae has 60,000. How many people put into a Kae?

12 A. Depending on – on the Kae well maybe 30.

13 Q. So are you saying you put in \$2,000 total or \$2,000...

14 A. TRANSLATOR: Each month.

15 Q. Each month? How many months?

16 A. Three years.

17 Q. For 3 years. So that's 3 at 30 – 30 – \$72,000. Is that right? \$2,000 a month
18 for 3 years is \$72,000, 36 times 2.

19 A. That's the interest.

20 Q. Alright, so you put in \$72,000 over 3 years but you get to take out \$60,000?

21 A. Yes. Because the first one doesn't get any interest.

22 Q. But you have – you've done this twice, is that right?

23 A. Yes.

1 Q. You were the first one?

2 A. Yes, the first one.

3 Q. Both times?

4 A. Only one.

5 Q. How about the second time you put in?

6 A. Maybe over 60,000 the second time because I wasn't the first one.

7 Q. Now you have -- the first time you played you got 60,000 because you were the
8 first hand, right? They call it a hand?

9 A. Yes.

10 Q. What did you do with that money?

11 A. As I remember I -- we loaned the money to Mr. Kim Hang Kwon.

12 Q. For what?

13 A. I don't remember but my -- my husband mentioned that -- that that person
14 needed that money so he loaned it to him.

15 Q. Did your husband mention why Mr. Kim Hang Kwon needed \$60,000?

16 A. No, I don't know.

17 Q. And this is all cash, right? There's not receipts for payments?

18 A. No, no receipts but there's a note saying this person borrowed this money.

19 Q. When you take out the -- I'm sorry, let's go back. There's a note saying this
20 person borrowed this money. Can you be more specific?

21 A. My husband -- no, I don't know.

22 Q. Do you know if your husband loaned Mr. Kim more than \$60,000?

1 A. He just – she doesn't remember how much but maybe my husband got some
2 more money and maybe altogether 100,000.

3 Q. Where did your husband get some more money from?

4 A. Maybe my husband had money from Korea.

5 Q. You think your husband brought, you said \$40,000 from Korea and put it
6 together with the 60,000 from the Kae and gave it to Mr. Kim Hang Kwon?

7 A. Yes, I – that's how I remember.

8 Q. Did – did – did your husband go back to Korea, fly back to Korea and bring it
9 back in cash?

10 A. Transfer money from – from Korea.

11 Q. Like a wire transfer?

12 A. Yes. Not – maybe not the bank wire transfer but through people who came.

13 Q. What people?

14 A. Somebody – somebody came from Korea.

15 Q. So somebody from Korea just carried some cash, \$40,000 of cash and brought
16 it to Mr. Kim?

17 A. Yes.

18 Q. Do you know who that was?

19 A. No, I don't know.

20 Q. Did you ever see the money yourself?

21 A. Yes.

22 Q. Where did you see the money?

1 A. At my house. The person brought the money to our – our house. Sorry –
2 sorry, in the – in the house.

3 Q. Had you ever seen that person before?

4 A. Yes, I have seen the person before.

5 Q. What's the person's name?

6 A. No, I don't know their name.

7 Q. How many times before had you seen that person?

8 A. The money went to Daora and then we pick up the money from them so I saw
9 them there.

10 Q. What money went to Daora?

11 A. No, money – somebody in Korea would give – get the money to Daora market
12 – Daora, and then I'll pick up the money from there.

13 Q. You went and picked up the money from Daora Poker?

14 A. Daora Managaha Shop.

15 Q. Daora Managaha Shop?

16 A. Yeah. At Garapan, Daora . . .

17 Q. Just right on the corner over here?

18 A. TRANSLATOR: Yeah.

19 Q. So somebody from Korea brought \$40,000 to Daora Poker or Daora Shop in
20 Garapan, and

21 A. As I remember there was 40,000 that was going to go to Mr. Kim Hang Kwon.
22 We already have the money in our – our house.

23 Q. Then what money came from Korea?

1 A. Because we were trying to do something else, some other business.

2 Q. So the money that came from Korea to the Daora Managaha Shop didn't have
3 anything to do with the \$40,000 for Mr. Kim Hang Kwon?

4 A. Part of that from – from Daora Shop and part of it was in our house together.
5 That's what I remember. That's how I remember it. I don't remember exactly how but...

6 Q. So you've got the cash in your house. Do you know how much money you
7 had in your house?

8 A. Yes, we had that much cash in the house.

9 Q. How much?

10 A. Maybe about 50,000. Maybe about 50,000 so the money from Kae put
11 together with money to Mr. Kim.

12 Q. So you had 50,000 in cash in your house plus the Kae money, the 60,000 Kae
13 money, is that right?

14 A. Yes, about that much.

15 Q. Like \$110,000 in cash?

16 A. Yes, but this was before we received the Kae money, so not – not 110,000.

17 Q. Okay, so only 50,000?

18 A. Yes.

19 Q. And then how much money did you have – did you get from Daora Managaha
20 Shop?

21 A. Okay. Not – not at – not at the time, but we've been receiving money from
22 Daora through another person.

23 Q. Who is that other person?

1 A. Transferred money through Daora. Certain exchange from Daora. It's like an
2 exchange. We don't receive the money from them but it was through them.

3 Q. From another person?

4 A. Yes.

5 Q. Who is that other person?

6 A. Don't know the name.

7 Q. Is it somebody in Korea?

8 A. Yes, from Korea.

9 Q. Is it a friend of your husband?

10 A. We don't – I don't know.

11 Q. Whose money is it that this person is giving to Daora Shop that you pick up?

12 A. I don't – I don't – I don't – I didn't understand the question but for Korean's
13 we . . . through another – through a company because the people bring in money from Korea.
14 Daora Market was – the Daora Shop was like a – a – like a mid point for getting – getting
15 their money.

16 Q. Okay. [indiscernible]. I want to clear up something quickly. The \$50,000 that
17 you say you had in the house before you got the Kae money, where did that \$50,000 come
18 from?

19 A. Money was brought in from Korea.

20 Q. You just said a little – about 5 minutes ago besides the money you brought
21 from Korea you had \$50,000 in your house. Didn't you say that?

22 A. No, I said the money was brought in from Korea.

23 Q. Okay, the money from Korea is that your money, your husband's money?

1 A. It was my husband's.

2 Q. Was it in a bank in Korea?

3 A. No, it was the money that we received back from – from a loan from another
4 person.

5 Q. Who is that person?

6 A. From a family – family members...

7 Q. What's the name of the family member?

8 A. Kim Sung He.

9 Q. Kim Sung K-h-e-e?

10 A. H-e, H-e.

11 Q. Kim Sung He, whose – whose – whose family member is that?

12 A. My sister.

13 Q. That's your sister and she borrowed money from you?

14 A. It was the money that I – I hand her before we came here. She handled the
15 money for me.

16 Q. How much money did you give her before you came here?

17 A. Doesn't remember how much but it was from the insurance and other stuff that
18 was still remaining in Korea.

19 Q. What insurance?

20 A. Life insurance, medical – medical insurance.

21 Q. You cashed in all this insurance?

22 A. Yes.

1 Q. Have you got documents to show all that, the – the cashing in the insurance
2 and how much money you got from the insurance?

3 A. Because of the – because we let my sister handle the insurance fee. I'm not
4 saying I tracked it out. We gave her the money to pay – continue paying for the insurance.

5 Q. How much money did you give her to continue paying for the insurance?

6 A. Maybe close to 100,000 Korean money.

7 Q. Do you know how much that is in US money?

8 A. The exchange rate is different from now and then so...

9 Q. When was it that you gave her this money? Right before you came to Saipan?

10 A. Before.

11 Q. So some time in 2002, right?

12 A. Yes.

13 Q. Then she took some of that money that you gave her and sent it to the Daora
14 Shop for you to pick up?

15 A. Not – not only from Daora but it's through some of the market from Daora
16 Shop.

17 Q. So your sister was sending you money from Korea?

18 A. Yes.

19 Q. Do you guys want any lunch or do you want to keep going? I'll leave it up to
20 you.

21 A. No, continue.

22 Q. Okay, we'll keep going.

23

1 MS. BUTCHER: How much . . . ? I mean, if you have more than an hour's worth then we
2 should break.

3 MR. HANSON: I think I have more than an hour's worth but I don't know. It depends on
4 how long it's going to take to get through this Korea money.

5 MS. BUTCHER: I think we need a break.

6 MR. HANSON: Okay. We'll take a break and we'll come back at -- is 1 o'clock alright? I
7 mean we can do it later. It's 12.00 right now.

8 TRANSLATOR: I -- I need to -- she needs to pick up her kids.

9 MR. HANSON: What time?

10 TRANSLATOR: Two-fifteen or two-thirty

11 MR. HANSON: I'll try to be finished by 2.30. To do that we'll start right at 1:00, okay? We
12 can -- let's break and then come back at maybe 10 minutes to 1:00 so we get ready and we can
13 start right away. Is that okay?

14 A. Okay.

15 MR. HANSON: Is that okay counselor?

16 MR. BUTCHER: Okay.

17 MR. HANSON: Okay, we're going to take a break for lunch. The time is 12:05 and we'll go
18 the record. We'll be coming back shortly before 1:00. Thank you.

19 [BREAK 01:38:32]

20 MR. HANSON: Okay, we're back on the record in the case of Li, Li and Xu v Jung
21 Jin Corporation *et al.*, case number 05-0019 in the deposition of Ms. Kim Sung Eun. It's
22 after a lunch break. The time is now 1:03. This is Mark Hanson, the attorney for the
23 plaintiffs and the officer for the deposition. In the room are still all the same people that were

1 here before lunch: Mrs. Kim, the deponent; Mio Kim, the translator; Kelly Butcher for the
2 defendants Kim Ki Sung, who is present, and KSK Corporation. Okay, thanks.

3 MR. HANSON:

4 Q. Now Mrs. Kim, before we left for lunch I was asking you questions about the
5 money – the source of the money that you believe was loaned to Kim Hang Kwon.

6 A. Yes.

7 Q. Now you said there was \$100,000 loaned to Kim Hang Kwon, is that right?

8 A. That's how I remember it.

9 Q. \$60,000 from the Kae and then that means there's another \$40,000 from some
10 other source?

11 A. No. That's how much – that's where our– that money was in our house.

12 Q. And that \$40,000 was in your house?

13 A. Yes.

14 Q. Where did that \$40,000 come from?

15 A. Part of it was from Korea and part of it was already in our house.

16 Q. Okay. The part that was already in the house, how much was that?

17 A. I don't remember but altogether I had about 50,000.

18 Q. So in your house you had – at this time – when was this? Do you remember
19 when this was?

20 A. I don't remember.

21 Q. To be clear, you don't remember the time where you had – you don't
22 remember what month and year it was when you had this \$50,000 in your house?

23 A. [no audible reply]

1 Q. And...

2 A. I'm not saying exactly it was 50,000 but it was about 50,000.

3 Q. And some of that came from Korea.

4 A. Came from Korea.

5 Q. Now the money that came from Korea. Was all of the money that came from

6 Korea from your sister, Kim Sung He?

7 A. Part of it was from my sister but also another part is from somewhere else.

8 Q. Where else?

9 A. Loaned from another person. Loaned from another person. That's what I
10 remember.

11 Q. You mean you or Mr. Kim borrowed money from somebody else in Korea?

12 A. As we need, we borrow money.

13 Q. Who is that you were borrowing money from in Korea?

14 A. Two sisters or siblings.

15 Q. What are their names?

16 A. Kim Sung He.

17 Q. That's one sister. And you have another sister you were borrowing money
18 from?

19 A. Kim Sung Min.

20 Q. Me?

21 A. Kim Sung Min.

22 Q. Min? Is that your sister?

23 A. Yeah, sister.

1 Q. So you were borrowing money from your sister, Kim Sung Min?

2 A. Yes.

3 Q. Were you borrowing money from anybody else?

4 A. No.

5 Q. So you got some money Kim Sung He...

6 A. As – as they're my siblings it's not like we loaned the money. It's my sister so
7 we borrowed the money and paid back.

8 Q. So you've paid – you – you – how much money did you borrow from Kim
9 Sung Min? How much money did she send you?

10 A. I don't remember.

11 Q. How much money have you sent back to Korea to Kim Sung Min?

12 A. Nothing.

13 Q. You – you haven't sent any money back to Korea?

14 A. No.

15 Q. To anybody?

16 A. No.

17 Q. Okay. How much money did . . . You don't know how much money Kim
18 Sung Min sent you?

19 A. No.

20 Q. Was it a lot of money?

21 A. Because it's a long time ago.

22 Q. How long – when is the last time Kim Sung Min gave you the money, sent you
23 money?

1 A. About 2 years.

2 Q. Was it – I mean was it thousands . . . ?

3 A. When we were buying the house. When we were buying the property. That's
4 when we needed the money.

5 Q. So \$250,000 for the San Vicente property?

6 A. Yes.

7 Q. Did – did she send you – your sister – could I just call her Min? Did your
8 sister, Sung Min, send you money for anything else besides the San Vincente house?

9 A. No.

10 Q. How about Kim Sung He? Did she...

11 A. We – we received money from her because we have money with them, our
12 money.

13 Q. Okay. And that was about 100,000 Korean won?

14 A. Yes.

15 Q. Did anybody else in Korea send money to Saipan for you for Mr. Kim or for
16 KSK Corporation?

17 A. I don't know. I don't understand.

18 Q. Okay. Is it possible that somebody besides Kim Sung Min and Kim Sung He
19 sent you money that you don't remember?

20 A. No, no. I don't remember if there was more from Korea.

21 Q. Now this money that Kim Sung Min sent you, was it – was it a lot of money?
22 \$10,000, \$20,000? How – can you give me an idea of about how much?

23 A. She doesn't remember.

1 Q. Were there any records of what – how much money Kim Sung Min gave you?
2 Did you write it down or did she write it down or was there – did you – did you write
3 anything down about how much money Kim Sung Min sent you?

4 A. No.

5 Q. Do you think she – do you know if she wrote down how much money she sent
6 you?

7 A. No.

8 Q. And it was all cash, is that right?

9 A. Yes.

10 Q. What – and when Kim Sung Min sent you money, she sent it through the
11 Daora Store?

12 A. Through Daora and through another person as well.

13 Q. And through, I think earlier you mentioned the San Jose store? That's Yoon,
14 right?

15 A. I don't know.

16 Q. Those companies, when they receive money for you do they keep a record of
17 that?

18 A. I don't know.

19 Q. When you go pick up the money, when you – you – you said you'd gone
20 before to the Daora Shop to pick up money, is that right?

21 A. Yes.

22 Q. When you go there and receive the money do they make you sign something to
23 say that you've received the money?

1 A. No receipts, no sign.

2 Q. Do you have to show them your ID so that they know that it's you that the
3 money's for?

4 A. No, they didn't.

5 Q. Alright. So part of the money, the 50,000 you had in the house came from
6 Korea?

7 A. Yes.

8 Q. The other part, where did that come from?

9 A. Some of it was borrowed. Some of it was from some business.

10 Q. What business?

11 A. KSK.

12 Q. So there's 50,000. Some was from KSK business. Some was from Korea and
13 some you borrowed in Saipan?

14 A. Yes, from Mr. Seo Yong Ki and also from her sister.

15 Q. Which sister?

16 A. A friend. A friend on Saipan.

17 Q. What's her friend's name?

18 A. I don't know the name, but it's Yoon Ja's mother.

19 Q. It's who?

20 A. Yoon Ja's mother.

21 Q. Yoon?

22 A. TRANSLATOR: Yoon Ja, Y-o-o-n J-a. Yoon Ja's mother.

23 Q. Yoon Ja's mother, did you just call her mom or something?

1 A. TRANSLATOR: Yoon Ja's mom.

2 Q. That's what you call her?

3 A. Yes.

4 Q. And you borrowed money from her?

5 A. Yes.

6 Q. How much money did she loan you?

7 A. As I remember it, 50,000.

8 Q. \$50,000? For what?

9 A. For buying the house.

10 Q. So you said \$50,000 for the house.

11 A. Yes.

12 Q. Okay. What about Seo Yong Ki? How much did he loan you?

13 A. I don't remember exactly, but maybe about 70,000.

14 Q. And what was that money for?

15 A. Also the building.

16 Q. Okay. So the money that you loaned to Mr. Kim Hang Kwon, the \$40,000 that

17 you gave to Mr. Kim Hang Kwon, where did that money come from?

18 A. Part of it was in the house and also from Korea.

19 Q. The part that was in – the part that was in the house, where did that come

20 from?

21 A. I had money left from Seoul, from Korea, and also from business.

22 Q. Do you remember when you – you bought the building?

23 A. I don't remember.

1 Q. Was it about the same time that – that you loaned money to Mr. Kim Hang
2 Kwon?

3 A. I don't remember, but maybe it was before I loaned the money to Mr. Kim
4 Hang Kwon.

5 Q. The loan – the loan from Mr. Seo Yong Ki, the loan – the money that he gave
6 you, was there any paper that you signed or that Mr. Kim, that your husband signed, like a
7 promissory note or something promising to pay him back?

8 A. No.

9 Q. Did you ever sign any document promising to pay Seo Yong Ki any money?

10 A. I don't remember.

11 Q. You don't remember if you signed something?

12 A. No.

13 Q. How about Yoon Ja's mom? Did you ever sign any paper promising to pay
14 her back?

15 A. No, just a friend.

16 Q. Did you ever pay Yoon Ja's mom back the money?

17 A. Yes, I did from Kae. She paid her – she paid her Kae, the monthly payment
18 installment for her. That's how I did pay.

19 Q. So the second time she – she did it...

20 A. Yes.

21 Q. ...and so she paid the \$2,000 a month to the Kae?

22 A. Yes.

1 Q. And then that was for Yoon Ja's mom and Yoon Ja's mom took her share
2 when it was her turn?

3 A. Yes.

4 Q. And where did that \$2,000 a month come from?

5 A. From our house.

6 Q. From your house? Were you doing two Kaes at the same time?

7 A. Yes, together. One was for me; one was for Yoon Ja's mom.

8 Q. So you were paying \$4,000 a month for Kaes?

9 A. Yes.

10 Q. In cash?

11 A. Yes.

12 Q. And that money was in your house?

13 A. Yes.

14 Q. How did the money get in your house?

15 A. Not just from the company. My husband dealt with it so I don't know.

16 Q. The building you're in, you have to pay monthly lease also, is that right?

17 A. Yes.

18 Q. How much is that?

19 A. It's -- it's different; maybe 1,100.

20 Q. And the Susupe property that used to Kim's and Park's. You have to pay
21 monthly for that too, right?

22 A. Yes.

23 Q. How much is that?

1 A. Eight hundred.

2 Q. Your husband just took out a lease on a new piece of property, is that right?

3 A. No.

4 Q. Where you have the new laundromat?

5 A. Rental.

6 Q. Rental? How much is that a month?

7 A. Nine hundred.

8 Q. The \$250,000 that it cost to buy this San Vicente building, you said you got
9 130 of that 250 from Seo Yong Ki and Yoon Ja's mom. Where did the other \$120,000 come
10 from?

11 A. Some of the money from my sister and some of the money I had in – in the
12 house.

13 Q. The money you had in the house, where did that come from?

14 A. It was a sudden decision that they made so it was – the money – the money
15 was borrowed from Korea.

16 Q. From your sister in Korea or someone else in Korea?

17 A. She collected money from several places. She got the money from Korea; got
18 the money that she had in the house and put together because there was a sudden decision.

19 Q. A sudden decision. How much – what – how much money did she get from
20 Korea. Out of the \$120,000 that it appeared you guys needed, how money did you get from
21 Korea?

22 A. I borrowed from my sister.

1 Q. It's actually 130,000. You borrowed from your sister? Anybody else in
2 Korea?

3 A. No, but the house in Susupe, my husband borrowed it from maybe somewhere
4 else.

5 Q. The -- do you know how much money he had to pay for that at the auction?

6 A. That he may know better.

7 Q. But Mr. Kim, your husband, borrowed that money from somebody else for the
8 Susupe house?

9 A. I don't -- I didn't got to the auction.

10 Q. I'll ask him about that. But I'm still interested in where the rest of the money
11 came from for the San Vicente lot if you know. You said you borrowed some so 70 and 50 is
12 120, not 130. So there's \$130,000 that I'm trying to figure out where it came from.

13 A. At the time the money from the business, money from the house and also the
14 money borrowed from Korea, from the sister.

15 Q. Okay. And how much money did you have in the house?

16 A. I don't remember exactly how much at the time.

17 Q. We're talking about \$130,000 here. Did most of that come from Korea? Did
18 most of it come from Saipan or was it 50/50?

19 A. I don't remember.

20 Q. And there aren't any documents that show where the money came from?

21 A. I don't remember. It's been a while.

22 Q. Do -- does KSK Corporation or do you keep documents about the -- the
23 transactions that you make the money that you borrow?

1 A. No.

2 Q. Do you have a notebook where you write down on this date my sister sent me
3 \$50,000?

4 A. No, I don't.

5 Q. So as you sit here today, you have no idea how much money you owe your
6 sister in Korea?

7 A. No.

8 Q. How much money does your sister, Kim Sung He still have of yours?

9 A. No, she takes – she takes care of that.

10 Q. She – does she have a little ledger of how much money she got and then how
11 much money she's sent you already?

12 OBJECTION: Speculation.

13 A. No.

14 Q. She does not have one?

15 A. No.

16 Q. Does she keep it in her head?

17 A. Maybe she remembers.

18 Q. But you haven't – you haven't bothered to try to remember how much money
19 your sister still has of yours?

20 A. No, I don't.

21 Q. Why if you have to borrow all of this money, hundreds of thousands of dollars,
22 from Seo Yong Ki and Yoon Ja's mom and Kim Sung Min, why if you're borrowing all these
23 hundreds of thousands of dollars do you give \$100,000 to Kim Hang Kwon?

1 A. It was a sudden decision from my husband. He said Mr. Kim Hang Kwon said
2 he needed the money all of a sudden and so she got the Kae and she borrowed money from
3 them to loan him the money.

4 Q. Even though they needed money to buy the San Vicente house – the San
5 Vicente building?

6 A. That I don't remember because it was with my husband.

7 Q. Do you know if Mr. Kim Hang Kwon was going to pay any interest on the
8 money that – that you gave him?

9 A. I don't know. I – I didn't give it to him. It was my husband.

10 Q. Now eventually your husband was able to work out an arrangement where Mr.
11 Kim Hang Kwon and Park Hwa Sun and their two companies, Jung Jin Corporation and Asia
12 Enterprises, instead of – you get Kim Hang Kwon and Park Hwa Sun and Jung Jin
13 Corporation and Asia Enterprises, Inc., you worked out an arrangement where Mrs. Park and
14 Jung Jin Corporation instead of paying you – instead of Mr. Kim and Asia paying you back
15 the \$100,000, Mrs. Park and Jung Jin transferred the laundromat, the Welcome Laundry and
16 the Welcome Poker to you, is that right?

17 OBJECTION: Leading.

18 A. That I don't know, it was my husband that dealt with them. I just remembered
19 him saying the – saying that they're going to get the machine.

20 Q. Did Mr. Kim Hang Kwon ever pay you back the \$100,000?

21 A. No.

22 Q. Did you, KSK or Kim Ki Sung pay Mrs. Park or Mr. Kim for Welcome
23 Laundry?

1 A. No.

2 Q. They just gave it to you?

3 A. Only Welcome Laundry. I don't remember. My husband took it from them
4 because they did not pay back.

5 Q. Your husband took it from them or KSK has it?

6 A. KSK.

7 Q. Did KSK ever loan Kim Hang Kwon any money?

8 A. KSK and Mr. Kim my husband are not the same?

9 Q. I don't know, are they the same?

10 A. I don't understand.

11 Q. KSK Corporation is a corporation, right?

12 A. Yes.

13 Q. You're the owner, right?

14 A. Yes. And my husband is the manager.

15 Q. Okay, but does your husband have an owner?

16 A. Not the owner.

17 Q. Okay, so it's different, right?

18 A. Yes.

19 Q. The company that you own, KSK Corporation, did that company give any
20 money to Kim Hang Kwon?

21 A. Not me; my husband.

22 Q. KSK Corporation, the company that you own, didn't – did they give any
23 money to Kim Hang Kwon?

1 A. No, not KSK.

2 Q. Did KSK Corporation give any money to Park Hwa Sun?

3 A. I don't understand, but my husband gave them the money.

4 Q. But my question is, did KSK, did the corporation write a check, give money in
5 any form to Park Hwa Sun at any time?

6 A. No. No, not – not KSK.

7 Q. How about either of their companies? Did KSK Corporation ever give Asia
8 Enterprises, Inc., or Jung Jin Corporation any money ever?

9 A. I don't know what [indistinct] make.

10 Q. When – when this laundromat, the Welcome Laundry and Welcome Poker and
11 Welcome Market, when that was transferred from Park and Kim to KSK Corporation and you
12 and your husband, did you keep all the employees that came with the company, that worked
13 with the company at the time?

14 A. No, I didn't, only a few, I don't remember.

15 Q. “No, you didn't,” “Only a few”, “I don't remember”. That's three answers.
16 Let's see if we can figure this out. Can you translate that?

17 A. I don't remember if there was all but I remember maybe four.

18 Q. So do you know how many people were working at the laundromat, the poker
19 place and the market before KSK took over?

20 A. No.

21 Q. But afterwards you – four of the people that – four of the employees that used
22 to work for Park and Kim stayed to work for you, KSK, and Mr. Kim?

23 A. Yes, because I – I don't know about the laundry business so we got those four.

1 Q. That happened when? Do you remember when that transfer happened?

2 A. I don't know.

3 Q. About January 2006? Does that sound right?

4 A. She remembers January, but not the year.

5 Q. Did you change the sign right away?

6 A. No, it didn't change.

7 Q. Did you ever change the sign?

8 A. Yes, we changed the name.

9 Q. When?

10 A. I don't remember.

11 Q. The money you got back from the – the bank loan, the \$100,000 bank loan,
12 from that money you went to pay back Seo Yong Ki, right?

13 A. Yes.

14 Q. You said you borrowed about \$70,000 from Seo Yong Ki?

15 A. That's how I remembered.

16 Q. So if you gave him back the 70,000 sum, what happened to the rest of the
17 \$100,000?

18 A. She doesn't know. I don't remember how the leftover was used.

19 Q. Did KSK open a wholesale general merchandise business?

20 A. No.

21 Q. Do you know if Seo Yong Ki, does he know Kim Hang Kwon?

22 A. I don't know.

23 Q. Is Seo Yong Ki in Saipan now?

1 A. I don't know now. But he was operating Chang Wan Restaurant.

2 Q. I'm sorry, he was operating what?

3 A. Chang Wan Restaurant.

4 Q. Right. Does he still – did he sell that business?

5 A. I don't know.

6 Q. The loan that you got from the bank for the \$100,000, in part of the papers that
7 you got that loan it says that you're supposed to give every year financial statements, your
8 own personal financial statements.

9 A. About what?

10 Q. First of all, do you remember that – that part of the – of the papers you signed?

11 A. I don't remember.

12 Q. Have you been giving the bank every year your personal financial statements?

13 A. No.

14 Q. After – when you took over – when KSK took over and Mr. Kim took over the
15 – the laundry, Welcome Laundry and Welcome Poker, they changed the names on the lease
16 with the Sablans, right?

17 A. Yes, I think I signed it.

18 Q. Okay. And then later, recently they cancelled, you cancelled the lease and did
19 a new lease, is that right?

20 A. Yes.

21 Q. Did you have to pay any money when you signed a new lease? Did you have
22 to pay money up-front to the Sablans for that new lease?

23 A. Deposit, yes.

1 Q. How much?

2 A. Five thousand.

3 Q. Where did that money come from?

4 A. From the company.

5 Q. From KSK?

6 A. KSK.

7 Q. The land is in the name of Kim Ki Sung though, right?

8 A. I don't know if it's in my husband's name.

9 Q. I wanted to show you this, Exhibit A. I'll mark it Exhibit A to this deposition
10 and I had to ask for a copy of this document unredacted. Do you see all the names have been
11 blanked out there?

12 A. Yes. Not mine – there's no – not my name in there. It would be my friend's.

13 Q. So your name does not appear anywhere on this paper underneath a the
14 redacted portion of it?

15 A. No. One it's from Yoon Ja's mom and the other one is through 7-11.

16 Q. So you do the Kae in somebody else's name?

17 A. Four of us together as a group.

18 Q. 7-11 is four of us together as a group?

19 A. Yes, four included in 7-11.

20 MR. HANSON: I'm gonna get an unredacted copy of this by the way, and I'll go to court to
21 get it if I have to but I just letting them know that.

1 Q. Which one of the – this is the first – when we were talking about the Kae
2 money that you used to give to Mr. Kim Hang Kwon, is this the record of that Kae money?
3 Was that the Kae money?

4 A. Yes, it's from that.

5 Q. Now it looks like there are 31 people – unless they're people because it sounds
6 like groups now; 31 different hands. I don't know what you'd call it, not hands, but 31
7 different people or groups.

8 A. Yes.

9 Q. And each one takes out some amount of money starting at \$60,000 for the first
10 – first...

11 A. Yes.

12 Q. So which one of those numbers was – represents the money, the \$60,000 that
13 you gave to Mr. Kim Hang Kwon?

14 A. Number one.

15 Q. Number one?

16 A. Number one.

17 Q. Number one, and that says \$60,000 and there's a date that says 2004 at 11/30,
18 is that right?

19 A. I don't remember the exact date but yes, I received that much and gave it to
20 Mr. Kim Hang Kwon.

21 Q. But the date on – on the paper says November 30, 2004, is that right, on that
22 line?

23 A. Yes.

1 Q. What's this in Korean? What does that word mean to that date on the same
2 line?

3 A. I don't know. It – it came from the person who gave me this paper.

4 Q. Well, what does it say?

5 A. TRANSLATOR: Exemplary.

6 Q. [to translator]: I'm asking her.

7 A. People exemplary.

8 Q. Like an example?

9 A. TRANSLATOR: Example, explanation.

10 Q. Explanation. I can't see the first line – you've blocked that out. What does
11 that first line – what's the name, what does that say underneath this piece of paper that it
12 taped here?

13 A. Nothing, people's name.

14 Q. What's the name on line number one?

15 A. I don't know.

16 Q. It's not your name?

17 A. No.

18 Q. And you don't know whose name it is?

19 A. No.

20 Q. But you got that \$60,000 and loaned that to Kim Hang Kwon?

21 A. Yes.

22 Q. How did you get the \$60,000 if that's not your name on line number one and
23 you don't even know whose name it is?

1 A. The – the – the person who deals with the Kae can give numbers to whoever is
2 in the group and it could be anybody.

3 Q. You were number one.

4 A. My number wasn't the first one but Mr. Kim Hang Kwon needed the money so
5 I changed to number one and received the money and gave it to Mr. Kim Hang Kwon.

6 Q. What number were you originally?

7 A. I don't remember exactly but I remember number ten maybe.

8 Q. And who did you change with?

9 A. I don't know but the person who deals with that [indiscernable].

10 Q. Okay, they call them the bankers. What do you call it?

11 A. TRANSLATOR: Kae Chu.

12 Q. Kae Chu, so it's the Chu – the Chu and the Kae.

13 A. The ones who [indistinct].

14 Q. Alright, who's that? What's – what's that person's name?

15 A. I don't know their names.

16 Q. You don't know their names? You paid \$2,000 a month to somebody and you
17 don't know their name?

18 A. I give – give the money.

19 Q. To who?

20 A. We don't – we don't know – I don't know the name, but I just bring it to their
21 house.

22 Q. Okay, where's their house?

23 A. Seven Colors, the photo shop.

1 Q. Seven Colors. You don't know the name of the owner of Seven Colors?

2 A. I just know the place, not the name.

3 Q. That was the Kae Chu, the owner of Seven Colors?

4 A. Yes.

5 Q. Kae Chu, and...

6 A. He organized the Kae.

7 Q. And you went to the person who you don't know the name, and asked them to
8 change around the order and give you \$60,000, is that right?

9 A. Yes.

10 Q. And who he traded you with that was number one before?

11 A. Usually, the first one to receive that money is the Kae Chu which will be the
12 owner of the – the Kae.

13 Q. So the Kae Chu switched with you?

14 A. Yes.

15 Q. And gave you \$60,000?

16 A. Yes.

17 Q. Now you said your name isn't anywhere on here, didn't you say that?

18 A. Yes, but the names on there is not real. They are names but it could be calling
19 names. It could be like not – not a real but maybe a place, you know. The Kae – Kae Chu
20 writes down whatever.

21 Q. Do you have a copy of this that shows the names?

22 A. Not me.

23 Q. Who has a copy of this that shows the names?

1 A. Kae Chu.

2 Q. So the only one he gave you is this one?

3 A. Yes. My husband copied it.

4 Q. From where?

5 A. I don't know. My husband knows.

6 Q. You said something about 7-11. Can you explain that to me?

7 A. It's a calling name. It's not a personal – personal name but it's a name of
8 something.

9 Q. You said it's a group of four of you that got together and call yourselves 7-11,
10 is that right?

11 A. No. One person has four slots, not four friends together.

12 Q. What person has four slots? Do you have four slots?

13 A. It's not a name but it's – as group, 7-11 we went in together.

14 Q. You went in with three other people.

15 A. That I don't know, but I went into 7-11 group.

16 Q. How many people are in 7-11 group?

17 A. I just know that I was a member of that group.

18 Q. How do you decide among the group who gets what payout at what month?

19 A. Number 31 doesn't really represent how many there are. One person can have
20 two slots and three slots, second slots, and I just went in as – as – as one.

21 Q. Okay. That didn't answer my question but I'm going to ask it again but I'm
22 going to ask another question first. One through 31, are those each months? Every month
23 there's a payout, is that right?

1 A. Yes.

2 Q. Okay. So I understand that there are not going to be 31 people but there's 31
3 months.

4 A. Yes.

5 Q. Now you said you went in as the group 7-11, is that right?

6 A. Yes.

7 Q. Does that mean that if this was uncovered and I could see this I would see 7-11
8 has several months?

9 A. Yes.

10 Q. Okay. How does 7-11, how do you and everybody else that's involved in 7-11
11 decide which 7-11 is you, which 7-11 is her, which 7-11 is her? How do you decide?

12 A. Because I have four different slots I tell them when we want to receive.

13 Q. Okay. Do you have any receipts for any payments you made to the Kae Chu?

14 A. No, we just give them.

15 Q. Do you have any receipts of any money that the Kae Chu gave to you?

16 A. No.

17 Q. And your name doesn't appear on this document underneath that redacted
18 portion?

19 A. Even the other groups, they don't have names.

20 Q. Do you have any evidence, any other witnesses, anybody that can testify to say
21 that you actually got the \$60,000 from the Kae Chu?

22 A. When we received 60,000 Kae – Kae money, I signed.

23 Q. What did you sign?

1 A. I received 60,000.

2 Q. What did it look like? Describe it to me?

3 A. It's a small paper I received 60,000 with my signature.

4 Q. Did he give you a copy of it?

5 A. No, it's already been a while.

6 Q. Who has that – that document?

7 A. I don't know. I – I don't have it. Maybe you can ask my husband.

8 Q. Does anybody else, besides that piece of paper, anybody else know or can tell
9 me that they saw you with the \$60,000 from the Kae Chu?

10 A. Only that person.

11 Q. Only...

12 A. It's done secretly.

13 Q. It's done secretly. Alright. [Asides] Let me just take a minute and look and
14 see if there's anything else that I'm forgetting but I think I'm done. Okay. I don't have any
15 more questions for you, Mrs. Kim. I thank you. Your attorney can ask you questions now if
16 she wants.

17 MR. HANSON: Ms. Butcher, do you have any questions?

18 MS. BUTCHER:

19 Q. Earlier Mrs. Kim, you had said that you were not an officer of KSK
20 Corporation.

21 A. Yes.

22 Q. Just a director?

23 A. Yes.

1 Q. But isn't it true that you're the president?

2 A. Yes.

3 MR. HANSON: Leading by the way.

4 MS. BUTCHER: But now I can lead. It's cross.

5 MR. HANSON: Well, yes and no. She's still your own client.

6 MS. BUTCHER:

7 Q. And again is your name anywhere on that document, referring to Exhibit A?

8 A. No. Even other persons, they don't have their names on it.

9 Q. And Mrs. Kim, your husband handles the financials of KSK Corporation?

10 A. Yes.

11 Q. Do you have regular corporate meetings for KSK?

12 A. Every now and then.

13 MR. HANSON:

14 Q. I'm sorry, what was the response?

15 A. Every now and then.

16 Q. Can you speak up please?

17 MS. BUTCHER:

18 Q. And every document that you signed for KSK Corporation has been explained

19 to you and you understand all the documents that you're signing?

20 A. Yes.

21 MS. BUTCHER: I have no further questions.

22 MR. HANSON: I do now. So let's take a 5 minute break so I can grab some

23 documents. Let's go off record. The time now is 2:05 and we'll come back in 5 minutes.

1 [BREAK 02:40:31]

2 MR. HANSON: Okay, we're back on the record after a very brief break. It's now
3 2:06 and this is re-examination time.

4 Q. Mrs. Kim, you just testified that all the documents that you signed were
5 explained to you and understand the documents.

6 A. At the time when I signed it was explained. I would sign then, but now I don't
7 remember.

8 Q. Okay, I'm going to show you what's been Bates stamped KSK document
9 number 337 and number – have you ever seen a document like that? Have you ever seen that
10 document before?

11 A. The poker's tax.

12 Q. What kind of tax?

13 A. I don't know but when – when it was explained to me then I knew and I
14 signed.

15 Q. Is that your signature at the bottom of this document at 337?

16 A. Yes.

17 Q. And that was – that's explained to you before you signed that?

18 A. Yes. Yes.

19 Q. The whole thing?

20 A. The main – the main numbers.

21 Q. And the meaning of it?

22 A. At the time, yes.

23 Q. At the time. How many times have you signed one, a document like this?

1 A. It may have been also for KSK for the bank and also for this – I don't
2 remember all of it.

3 Q. How many times a year do you have to sign one of those?

4 A. I don't know.

5 Q. Would it surprise you to know you sign one of those things four times a year?

6 A. Also because I'm – I'm signing for the bank and other – other [indistinct]. I
7 don't remember that I signed four times.

8 Q. Well, I'm asking about this document.

9 A. This is BGR tax for four times a year.

10 Q. Okay, is that's for BGR tax, is that what that document is?

11 A. I think so.

12 Q. What is BGR tax?

13 A. It's for the poker – poker office tax and also for the BGR for the employees.

14 Q. Anything else?

15 A. Other than that, I don't know.

16 Q. KSK in discovery provided me this copy of this document 337 and several
17 other documents and I count about – it looks like more than – or about 19 or 20 BGRT returns
18 that have been filed for KSK Corporation. Since 2003 each one appears to have your name
19 on it. Does that sound right?

20 A. Yes. But I don't remember how many.

21 Q. How many what?

22 A. How many signatures. I don't know how many signatures I signed.

1 Q. But you do remember that every time you signed this, somebody explained to
2 you what it was that you were signing, the substance of it, what it meant?

3 A. I trust my husband, so I sign.

4 Q. What does that mean, you trust your husband so you sign?

5 A. I – I trust – trust the translation that was given to my husband.

6 Q. Do you remember what the translation was that was given from your husband?

7 A. She also explained it to me and she assures it from the office before she
8 explained to me and sometimes I will go to the office.

9 Q. And this particular document has been explained to you at least 19 or 20 times,
10 right?

11 A. Yes.

12 Q. Can you explain to me what – what this – this particular document, right here,
13 do you – do you understand what – what these four first columns here, what those are – what
14 those are?

15 A. I don't know.

16 Q. Even though it's been explained to you 19 or 20 times, you still don't know
17 what that is?

18 A. Even though it's repeated 19 or 20 times, I – I just [indistinct]. I don't
19 remember.

20 Q. So doesn't – doesn't Mr. Kim just come and he gives you the document and he
21 says it's time to sign, please sign, and you sign and that's all that happens?

22 A. No, he would explain roughly what it is.

23 Q. When you say "roughly", what do you mean "roughly"?

1 A. He would say this is how much we're going to have to pay this month and then
2 this – put in this particular document and then I sign. It's not like I go there to pay by myself.

3 Q. Okay. We'll look at some more. Okay. I'm going to show you what has been
4 previously Bates stamped KSK document number 229 through 231. Have you ever seen that
5 before?

6 A. I think I remember.

7 Q. Do you know what it is?

8 A. I don't know who...

9 Q. Was it explained to you?

10 A. I cannot remember. Maybe it's a bank loan.

11 Q. Okay. Did anybody ever explain to you that you're supposed to be giving the
12 bank a personal financial statement every year?

13 A. Can you explain that one more time?

14 Q. Did anybody every explain to you that by signing that you're agreeing to
15 provide the bank with a personal financial statement, your personal financial statement every
16 year?

17 A. People come to ask her to turn in the bank statement every year.

18 Q. Not a bank statement, a financial statement?

19 A. They came every year to ask for that statement. Also maybe to make sure that
20 they're living there, not gone.

21 Q. Who is it that comes in?

22 A. The employee from the bank.

1 Q. Okay. When I asked you earlier you said no, you didn't give the bank any
2 personal financial statements?

3 A. Okay. I didn't understand that then but as I saw these papers I remembered.

4 Q. Do you have copies of those personal financial statements?

5 A. My husband has them.

6 Q. Okay. So this is explained to you, right?

7 A. Yes.

8 Q. Before you signed?

9 A. Also together with my husband those people from the bank explained it to me.

10 Q. Did they? Do they speak Korean?

11 A. No. No.

12 Q. Then you understand English?

13 A. Okay. My husband understands roughly what they want.

14 Q. Roughly. And he roughly explained it to you?

15 A. And also my daughter.

16 Q. Kim Ok Ja?

17 A. That's my mom.

18 Q. Who explained to her what this document meant?

19 A. My daughter. My daughter and my son so they would explain some of that to
20 me.

21 Q. What about to your mother? Who explained to your mother?

22 A. I just saw my mom because she's old.

23 Q. You told your mom what it means?

1 A. Yes.

2 Q. When did you do that?

3 A. Just every now and then.

4 Q. Your mom, does she send in personal financial statements to the bank every
5 year?

6 A. Not my mom.

7 Q. She doesn't?

8 A. She – she doesn't. She doesn't.

9 Q. I'm going to show you what's been Bates stamped KSK document 228. Have
10 you seen that before?

11 A. I – I've seen it that's why it's signed by me.

12 Q. Did somebody explain that to you before you signed it?

13 A. Yes.

14 Q. Who explained that to you before you signed it?

15 A. My husband.

16 Q. What did he tell you about that document?

17 A. Back that I understood what he explained to me, but now I don't remember.

18 Q. Now you've signed all of these documents for the bank loan... I'm sorry, let's
19 go back to the document I just showed you before. You signed the document, the 229
20 through 231. If you look at the last page, that's your signature, right, on the last page there?
21 Is that right?

22 A. That's my signature.

23 Q. And this – this document was fully explained to you, is that right?

1 A. Yes.

2 Q. So it was explained to you that the purpose of this loan was for working capital
3 for a wholesale general merchandising to open a bakery shop, right?

4 A. At the time we were going to operate the whole – whole – wholesale and also
5 the baker but it didn't work out.

6 Q. That's January 17, the date of that, right? Is that right?

7 A. I don't know.

8 Q. Well you see...

9 A. January 18?

10 Q. Okay. The signature of your husband is dated January 18th. Is that what
11 you're referring to there?

12 A. Yes.

13 Q. I'm going to show you what's been marked as document, KSK document
14 number 296. Do you recognize that?

15 A. This is from the bank?

16 Q. Do you know what date that was issued?

17 A. I don't remember. January 30 it's written.

18 Q. Do you know what year?

19 A. I don't remember.

20 MR. HANSON: I need a clean copy of that. You chopped off the date.

21 Q. Do you remember what year it was that you paid back – do you ever remember
22 writing a check. Is your signature anywhere on this document 296?

23 A. No.

1 Q. No? [Asides] This is a cashier's check to Seo Yong Ki.

2 A. Is it the money that I paid through my husband? I don't think it's my
3 signature.

4 Q. No, this – this would be from the bank. You guys put the money into the bank
5 and then the bank – you ask for a check and they write a check? Like a bank check. You
6 give them the money and they write a check. This was a payment to Seo Yong Ki for
7 \$76,000.

8 A. Yeah, so?

9 Q. Do you remember this payment being on about January 30, 2006?

10 A. I don't remember the date, but I do remember it was given to him from the
11 bank.

12 Q. And that was about 12 days after you got the loan, is that right, after you
13 signed the promissory note? After you signed this letter right here, this isn't even a
14 promissory note. You signed this letter on – on January 18 you said.

15 Q. Twelve days later – 12 days later you took some of that \$200,000, \$76,000 of
16 it, and got a cashier's check and gave it Seo Yong Ki, right?

17 A. I don't remember the date but it was given to Mr. Seo Yong Ki.

18 Q. How soon after you received the money did you give the money – did you give
19 \$76,000 to Seo Yong Ki? How . . . ?

20 OBJECTION: [indiscernible].

21 A. I don't know.

22 Q. We can stay here all day to do this. You see this says January 30-something,
23 right, 2000-and-something?

1 A. Yes.

2 Q. When you guys copied the document you cut it off.

3 A. I don't know.

4 Q. Well, let's think about this. January 30, 2007. That would be more than a year
5 after you got the \$100,000 bank loan, right?

6 MS. BUTCHER: [indiscernible].

7 A. No, not January – not January 30.

8 Q. Okay. Now, I'm going to show you basically the full duplicate of what this is.
9 Do you see the date on there?

10 A. Yes.

11 Q. 2006. This – this money, this \$76,000 that's been to Seo Yong Ki, did that
12 money come from the bank loan?

13 A. Yes.

14 Q. Okay. And this check was issued 12 days after you signed this document, the
15 229 to 231, right?

16 A. I don't remember if [indistinct] I'm sure I got the loan from the bank.

17 Q. Let's do the math. Do you see what did you sign that?

18 A. I don't remember exactly when.

19 Q. What date does that document 231 say you signed?

20 A. Yes.

21 Q. What date?

22 A. Eighteenth.

23 Q. Of what year?

1 A. 2006

2 Q. January 18, 2006.

3 A. Yes.

4 Q. How many days later was this check issued?

5 A. I don't know. After I got the loan it was written.

6 Q. Okay. What's the date on the check?

7 A. January 30, 2006.

8 Q. How many days after this document was signed was that check issued?

9 A. I don't remember.

10 Q. How many days after January 18, 2006, does January 30, 2006, come?

11 A. I don't know.

12 Q. Are you just not understanding what I'm asking you?

13 A. She doesn't remember.

14 Q. I'm not asking you to remember. I'm asking you to look at the documents that
15 you signed and that was issued from the bank. Look at the dates and tell me how many days
16 in between this document and this document on the dates on the document. How many days?

17 A. Twelve days.

18 Q. Twelve days. In 12 days you went from saying you were going to open up a
19 bakery shop to giving Seo Yong Ki \$76,000 as a repayment of a loan, right? Twelve days.

20 A. We thought the -- we thought the loan would come in much later but it came in
21 very fast. The -- the loan came in much faster than we speculated so we decided it was to paid
22 off, yeah, to pay off.

1 Q. But that's not what you said 5 minutes ago. You said "the bakery shop didn't
2 work out, so we decided to pay the money."

3 A. Okay, we planned on opening the wholesale and the bakery shop but it came
4 out too fast. They were expecting – we were expecting it to come in much later but it came in
5 fast. We weren't ready.

6 Q. Did you tell the bank when you were getting this loan that you owed Seo
7 \$76,000?

8 A. No.

9 Q. Did you tell the bank when you got this loan that you owed somebody's mom
10 – what's her name? Yoon Ja's mom \$50,000?

11 A. No.

12 Q. Did you tell the bank that you didn't open a bakery shop, that you took the
13 money and you paid Seo?

14 A. No.

15 MR. HANSON: Alright. I'm done. Do you want to ask any more questions?

16 MS. BUTCHER: No.

17 MR. HANSON: Okay, Mrs. Kim, thank you. I think that's it. The time now is 2:34.
18 Nobody has any further questions. Do you have anything you want to put on the record
19 before we close the deposition?

20 MS. BUTCHER: No.

21 MR. HANSON: Okay. I don't have anything further. I want to thank you for
22 coming, Mrs. Kim. I thank the translator for translating and with that I will close the
23 deposition.

1 Thank you.

2 END OF DEPOSITION – 03:08:11

LIST OF EXHIBITS:

Exhibit KSK A	Kae Ton game document (redacted)
Exhibit KSK Doc. #228	January 19, 2006 letter from KSK to Bank of Federated States of Micronesia
Exhibit KSK Doc. #229-231	Bank of Federated States of Micronesia Loan Approval Letter for KSK Corporation.
Exhibit KSK Doc. #296	Cashier's Check payable to Seo Yong Ki
Exhibit KSK Doc. #337	KSK Business Gross Revenue Tax Return filed July 30, 2003

CERTIFICATE

I, KIM SUNG EUN, hereby certify that I have reviewed the pages of the foregoing testimony of this deposition and I hereby certify it to be a true and correct record.

Date: _____

KIM SUNG EUN

RULE 30(f)(1) Certification

I, Mark B. Hanson, do hereby certify:

That the foregoing deposition was taken by digital voice recording on the 9th of April, 2008 in the office of Mark B. Hanson and that the deponent was duly sworn by the undersigned Notary Public for the CNMI;

That the foregoing pages are a true and accurate record of the testimony of the deponent made from the examination record made at the time of the deposition and transcribed under my direction and thereafter verified by me to the best of my knowledge and ability;

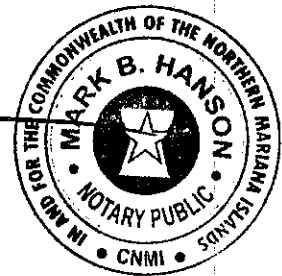
That no Rule 30(e) review was requested before completion of the deposition; and

That the deponent has been notified, this day, of the completion of this transcript, the original of which is hereby filed with the office of Mark B. Hanson.

Sworn this 18th day of June, 2008 in Saipan, Commonwealth of the Northern Mariana Islands.



MARK B. HANSON



MARK B. HANSON
NOTARY PUBLIC
Commonwealth of the Northern Mariana Islands
My Commission Expires: 12-8-2008
P.O.Box 5682 CHRB Saipan, MP 96950

Exhibits

KSH Corporation

PMB # 234 Box 10001 SAIPAN MP 96950

TEL.No: (670)234-2331 FAX No: (670)235-4225 CELL PHONE: (670)287-5077

JAN. 19, 2006

MR. BOB DE COURTENAY
PRESIDENT
BFSM
P.O.Box 98
KOLONIA POHNPEI 96941
FEDERATED STATES OF MICRONESIA

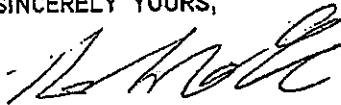
THANK YOU FOR GIVING US THE APPROVAL OF THE LOAN FOR THE BUSINESS
I AM GLAD TO ACCEPT YOUR OFFER AND CHANCE TO DEVERISFY OF KSK CORPORATION.

I AM SENDING THE ATTACHMENT FROM TONY WITH THE SIGNATURES ON IT.

I WOULD LIKE TO PROCESS THE LOAN AS SOON AS POSSIBLE EVEN THOUGH THERE ARE
FEES TO PAY YOUR SAIPAN ATTORNEY. I WILL PAY IT FOR THAT.

THANK YOU AGAIN FOR YOUR APPROVAL OF MY LOAN.

SINCERELY YOURS,



KIM SUNG EUN
PRESIDENT



Bank of the Federated States of Micronesia

January 17, 2006

Sung Eun Kim
President
KSK Corporation
PMB #234 Box 10001
Saipan, MP 96950

Dear Sung Eun Kim,

I am pleased to inform you that Bank of FSM ("Bank") has approved your business loan request as follows:

Borrower: KSK Corporation, Inc.

Lender: Bank of FSM

Facility: \$100,000 Term Loan

Purpose: Working Capital for wholesale of general merchandise and bakery shop.

Term: 5-year term (full amortization).

Repayment: Repaying \$2,138 monthly (P&I).

Interest Rate: U.S. Prime Rate + 3.00% (Variable). Initial rate at 10.25%, as of 1/17/06.

Loan Fee: \$1,000 or 1% of loan amount payable at loan closing.

Primary Source of Repayment:
Cash flow from amusement center (poker machine), commercial & residential rental, bakery, and wholesale of general merchandise.

Secondary Source of Repayment:

1. Refinance.
2. Liquidation of collateral.
3. Call on guarantors.

January 17, 2006
KSK Corporation, Inc.
Commitment Letter
Page 2 of 3

Collateral:

1. Registered first leasehold mortgage over Lot 32-4-R1, as more particular described on Drawing/Cadastral Plat No. 2102/91, the original of which was recorded April 18, 1991 as Document No. 91-1922 at Commonwealth Recorder's, Saipan.
2. Security agreement interest on all business assets including poker machines, equipment, furniture & fixtures.

Guarantors:

Joint and several continuing guaranty of Sung Eun Kim, Sung Kim, and Ok Ja Kim.

Insurance:

The Bank is to be provided with evidence that fire and extended coverage insurance on all Bank security shall be maintained at all times. The Borrower shall submit to the Bank a binder or certificate of insurance naming Bank of FSM as "Loss Payee".

Legal Documentation & Expenses:

- Borrower will pay for all expenses related to documenting this loan.

Financial Reporting:

- Borrower shall submit to Bank no later than ninety (90) days after end of its fiscal year, beginning December 31, 2005, and annually thereafter, a copy of the following:
 1. Company prepared financial statements, including balance sheet and income statement.
 2. Business gross revenue tax returns.
 3. Updated personal financial statements on Sung Eun Kim, Sung Kim, and Ok Ja Kim.

Financial Covenant(s):

- Minimum debt-service-coverage ratio of 1.25:1.00.
- Minimum tangible net worth of \$150,000.

January 17, 2006
KSK Corporation, Inc.
Commitment Letter
Page 3 of 3

This letter evidences the commitment of Bank to extend financing exclusively to Borrower, and Borrower's commitment to accept said financing. This letter does not set forth all terms and conditions of the credit facility offered herein. Rather, it is an outline, in summary format, of the major points of understanding that will form the basis of the final loan documentation. Bank of FSM shall not be obligated to or fund the loan unless and until all conditions of this commitment letter have been satisfied.

We trust that this facility will provide your company with the financing flexibility that you will need for your continued growth. Should you have any questions, please do not hesitate to let me know.

Please indicate your acceptance of the aforementioned terms and conditions by signing in the space provided below and returning the executed copy of this letter by the close of business on January 31, 2006.

Thank you for banking with Bank of the Federated States of Micronesia.

Sincerely,



Antonio John
Credit Administrator

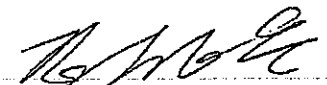


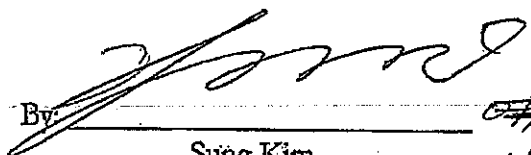
Robert DeCoutteney
President & CEO


ACCEPTANCE AND AGREEMENT

The foregoing agreement with all its terms and conditions are hereby accepted this 18th day of January 2006.

Borrowers:

By: 
Sung Eun Kim

By: 
Sung Kim
01/18/06

By: 
Ok Ja Kim

Bank of Hawaii

CASHIER'S CHECK

101-501/121
790197

CUSTOMER'S RECEIPT AND AGREEMENT

January 30, 2006

ISSUED BY Chalan Kanoa

\$76,000.00

PAY TO THE ORDER OF

*****SEO. YONG KI*****

NOTICE TO CUSTOMERS

You usually cannot stop payment of the attached check after you send it to the payee. If it is lost, stolen or destroyed, notify Bank of Hawaii immediately. You may be required to buy an indemnity or surety bond before a replacement or refund is issued.

See reverse for agreement regarding this cashier's check.

NOT NEGOTIABLE

Fee \$8.00

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT.

Bank of Hawaii

101-501/121
790197

CASHIER'S CHECK

ISSUED BY Chalan Kanoa

January 30, 2006

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

*****SEO. YONG KI*****

\$76,000.00

SEVEN SIX
600000
ZERO ZERO ZERO CENTS

A. TAITANO/S. DUENAS

AUTHORIZED SIGNATURE

7901970 121405018 0038071261



DIVISION OF REVENUE AND TAXATION
COMMONWEALTH GOVERNMENT OF THE NORTHERN MARIANA ISLANDS
BUSINESS GROSS REVENUE TAX QUARTERLY RETURN



(Please type or print in ink)

(See reverse side of this form for instructions)

20**DLN**

A. 1. Taxpayer's Name KSK CORPORATION	C. 1. Taxpayer's Identification Number (TIN) 99-3004093	F. MARK HERE IF THIS IS A FINAL RETURN AND INDICATE THE DATE WHEN BUSINESS WAS CLOSED OR DISSOLVED. <input type="checkbox"/>
A. 2. Doing Business As Fun & Win Poker	C. 2. TIN previously reported, if different from above	
B. Mailing Address PMB 234 Box 10001 Saipan MP 96950	D. Quarter Ended <u>March 30, 2003</u> E. Telephone Number(s) 235-7700	

G. BUSINESS FORM:

- ☐ SOLE PROPRIETORSHIP ☐ PARTNERSHIP
☐ CORPORATION ☐ ASSOCIATION
☐ NON-PROFIT ORGANIZATION

H. LOCATION OF BUSINESS

- ☐ SAIPAN ☐ TINIAN
☐ ROTA ☐ NORTHERN IS.

(Indicate Village)

I. ACTIVITIES:

- ☐ RETAILING ☐ LAND LEASE ☐ BARBER/BEAUTY SHOP
☐ CONSTRUCTION ☐ NIGHT CLUB ☐ HOUSE RENTAL (UNITS) _____
☐ TAILORING SHOP ☐ SERVICES _____
☐ OCEAN SHIPPING ☐ OTHER(S): _____

(Specify each separately)

J. COMPUTATION OF TAX AND OTHER CHARGES

			FOR OFFICIAL USE ONLY
1. TOTAL REVENUE FOR THE PERIOD JANUARY 1 - MARCH 31.	0		
2. TOTAL REVENUE FOR THE PERIOD APRIL 1 - JUNE 30.			
3. TOTAL REVENUE FOR THE PERIOD JULY 1 - SEPTEMBER 30.			
4. TOTAL REVENUE FOR THE PERIOD OCTOBER 1 - DECEMBER 31.			
5. TOTAL OF LINES 1, 2, 3, AND 4.	0		
6. LESS REVENUE NOT SUBJECT TO TAX. (attach detailed statement of explanation)			
7. GROSS REVENUE SUBJECT TO TAX. (line 5 minus line 6)	0		
8. TAX ON AMOUNT SHOWN ON LINE 7.			
9. TAX ALLOCATED PREVIOUS QUARTER(S).			
10. TAX ALLOCATED THIS QUARTER. (line 8 minus line 9)	0		
11. TAX (OVERPAID) FROM PREVIOUS QUARTERS, IF ANY.			
12. TAX DUE (OVERPAYMENT) THIS QUARTER. (line 10 minus line 11, if any)	0		
13a. ENTER AMOUNT OF EDUCATIONAL CASH CONTRIBUTIONS MADE THIS YEAR			
13b. ENTER EDUCATION TAX CREDIT TAKEN PRIOR QUARTER(S)			
13c. EDUCATION TAX CREDIT AVAILABLE THIS QUARTER			
13d. EDUCATION TAX CREDIT (see instructions/attach Schedule ETC)			
14a. OVERPAYMENT CREDIT FROM FORM 1120CM OR 1040 CM, IF ANY. (See instructions)			
14b. ENTER YEAR OF RETURN FOR WHICH CREDIT WILL BE APPLIED FROM			
14c. ENTER TYPE OF RETURN FOR WHICH CREDIT WILL BE APPLIED FROM			
15. TAX AFTER CREDIT. (line 12 minus lines 13d and 14a)			
16. PENALTY CHARGE (If return is filed and paid after the deadline, complete this line.)	16a (10%)		
	16b (1%)		
17. INTEREST CHARGES. (If payment is made after the deadline, complete this line.)			
18. TOTAL DUE (Add lines 15, 16a, 16b and 17)	0		

K. DECLARATION: Under the penalties of perjury, I declare that this return is, to the best of my knowledge and belief, true and correct.

 KIM, SUNG EUN Name (Typed) and Signature	President Title	<u>7/28/03</u> Date
PAID PREPARER'S USE ONLY	Preparer's Signature: _____ Firm's Name: _____	Date: _____ Preparer's SSN: _____ TIN: _____ Mailing Address: _____

FOR OFFICIAL USE ONLY			
Account No:	Account No:	Account No:	Account No:
Amount:	Amount:	Amount:	Amount:
DATE PAID:	RECEIPT NO:	RECEIVED BY:	POST MARK:
VERIFIED BY:	INPUT BY:	INPUT DATE:	